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## Attorneys for Creditor Nor-Cal Pipeline Services

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re

## **PG&E Corporation,**

## Debtor-in-Possession.

Case No. 19-30088-DM  
Chapter 11  
Hon. Dennis Montali

### *Lead case*

**In re**

## Pacific Gas and Electric Company,

## Debtor-in-Possession.

Case No. 19-30089-DM  
Chapter 11  
Hon. Dennis Montali

### *Jointly administered*

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

Affects both Debtors

**DECLARATION OF DAVID A.  
JAEGER, SR. IN SUPPORT OF NOR-  
CAL PIPELINE SERVICES' LIMITED  
OBJECTION TO CURE AMOUNTS IN  
CONNECTION WITH DEBTORS' AND  
SHAREHOLDER PROPONENTS'  
JOINT CHAPTER 11 PLAN OF  
REORGANIZATION**

## Hearing:

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Date: May 27, 2020

Time: 10:00 a.m. Pacific Time

Place: 450 Golden Gate Ave., Floor 18  
Courtroom 17  
San Francisco, CA 94102

*Please check [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for updates in response to COVID-19 pandemic, including telephonic-only hearings.*

## JAEGER DECLARATION

I, David A. Jaeger, Sr., declare as follows:

1. I am the President of Nor-Cal Pipeline Services. I make this declaration in support of *Nor-Cal Pipeline Services' Limited Objection to Cure Amounts in Connection with Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization*. I am over 18 years of age. Except as indicated otherwise, I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto.

2. Nor-Cal Pipeline Services provides a variety of services to the Debtors under a master services agreement. Its services include the use of ground-penetrating radar that quickly and safely determines the location and depth of utility lines, specialized excavation methods that reduce or eliminate the risk of damaging nearby utility lines, and the inspection, maintenance, and installation of pipelines.

3. As of January 29, 2019, the Debtors owe Nor-Cal Pipeline Services at least \$1,540,527.58 for prepetition services remaining on the proposed contracts to be assumed. A true and correct listing of open invoices through January 30, 2019, is attached hereto as **Exhibit A**.

I declare under penalty of perjury that the above statements are true and correct. This declaration is executed on May 15, 2020, in California.

/s/ David A. Jaeger, Sr.  
David A. Jaeger, Sr.

## JAEGER DECLARATION